

**SULLIVAN & CROMWELL LLP**

125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION :  
CORPORATION, :  
:  
Plaintiff, :  
:  
v. :  
BERNARD L. MADOFF INVESTMENT SECURITIES LLC, : SIPA Liquidation  
Defendant. : No. 08-01789-SMB  
(Substantively Consolidated)  
:

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In re :  
:  
BERNARD L. MADOFF, :  
:  
Debtor. :  
:

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IRVING H. PICARD, Trustee for the Liquidation of Bernard L. : Adv. No. 12-01565-SMB  
Madoff Investment Securities LLC, :  
Plaintiff, :  
v. :  
:  
STANDARD CHARTERED FINANCIAL SERVICES :  
(LUXEMBOURG) S.A., as represented by its liquidator Hanspeter :  
Krämer, f/k/a AMERICAN EXPRESS FINANCIAL SERVICES :  
(LUXEMBOURG) S.A. and f/k/a AMERICAN EXPRESS BANK :  
(LUXEMBOURG) S.A., *et al.*, :  
Defendants. :  
:

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**COUNTER-DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED  
IN THE RECORD ON APPEAL BY APPELLEES  
STANDARD CHARTERED FINANCIAL SERVICES (LUXEMBOURG) S.A.,  
STANDARD CHARTERED BANK INTERNATIONAL (AMERICAS) LTD.  
AND STANDARD CHARTERED INTERNATIONAL (USA) LTD.**

In response to the Trustee's March 28, 2017 Statement of Issues To Be Presented and Designation of Items to Be Included in the Record on Appeal (Dkt. No. 114 in Adv. Pro. No. 12-1565), and pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure, Appellees Standard Chartered Financial Services (Luxembourg) S.A. (f/k/a American Express Financial Services (Luxembourg) S.A. and f/k/a American Express Bank (Luxembourg) S.A.), as represented by its Liquidator Hanspeter Krämer, Standard Chartered Bank International (Americas) Ltd., f/k/a American Express Bank International and Standard Chartered International (USA) Ltd., f/k/a American Express Bank Ltd. (collectively, "Standard Chartered"), hereby counter-designate the following additional items to be included in the record on appeal:

<b>Item No.</b>	<b>Date</b>	<b>Docket No. (Adv. Pro. No. 12-1565)</b>	<b>Docket No. (Adv. Pro. No. 08-01789)</b>	<b>Docket Text</b>
1.	May 7, 2012	4	n/a	Motion to Approve Application by Way of Order to Show Cause Seeking Entry of an Order Directing Defendants to Make Expedited Limited Initial Disclosures, Or to Provide Immediate Notice of Certain Adversary Proceedings filed by Keith R. Murphy on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC
2.	May 7, 2012	5	n/a	Memorandum of Law in Support of Trustees Application by Way of Order to Show Cause Seeking Entry of an Order Directing Defendants to Make Expedited Limited Initial Disclosures, Or to Provide Immediate Notice of Certain Adversary Proceedings filed by Keith R. Murphy on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC.

Item No.	Date	Docket No. (Adv. Pro. No. 12-1565)	Docket No. (Adv. Pro. No. 08-01789)	Docket Text
3.	May 7, 2012	6	n/a	Affidavit / Affidavit of Torello H. Calvani in Support of the Trustees Application by Way of Order to Show Cause Seeking Entry of an Order Directing Defendants to Make Expedited Limited Initial Disclosures, Or to Provide Immediate Notice of Certain Adversary Proceedings filed by Keith R. Murphy on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC.
4.	May 8, 2012	8	n/a	Order signed on 5/8/2012 to show cause why defendants should not be required to make expedited limited initial disclosures or to provide immediate notice of certain adversary proceedings with hearing to be held on 5/16/2012 at 10:00AM in courtroom 623.
5.	May 14, 2012	13	n/a	Response to Motion To Approve Order to Show Cause Why Defendants Should Not Be Required to Make Expedited Limited Disclosures Or To Provide Immediate Notice of Certain Adversary Proceedings filed by Robinson B. Lacy on behalf of Standard Chartered Bank International (Americas) Ltd., Standard Chartered International (USA) Ltd.
6.	May 29, 2012	24	n/a	Notice of Withdrawal / Limited Notice of Withdrawal of Trustee's Application Seeking Entry of Order Directing Defendants to Make Expedited Limited Initial Disclosures or Provide Immediate Notice filed by Marc E. Hirschfield on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC.

Item No.	Date	Docket No. (Adv. Pro. No. 12-1565)	Docket No. (Adv. Pro. No. 08-01789)	Docket Text
7.	April 8, 2016	n/a	13070	Letter on Behalf of the Subsequent Transferee Defendants in Response to Mr. Sheehans Letter dated April 7, 2016 Filed by Franklin B. Velie on behalf of Bank Austria Worldwide Fund Management Ltd.

For each item designated, the designation includes all documents referenced with the particular document number including, without limitation, all statements, appendices, exhibits, attachments, declarations, and affidavits related thereto. Standard Chartered reserves the right to designate additional items for inclusion in the record.

Dated: New York, New York  
April 11, 2017

**SULLIVAN & CROMWELL LLP**

/s/ Diane L. McGimsey  
Diane L. McGimsey  
(mcgimseyd@sullcrom.com)  
1888 Century Park East  
Los Angeles, California 90067  
*Admitted pro hac vice*

Sharon L. Nelles  
(nelles@sullcrom.com)  
Andrew J. Finn  
(finna@sullcrom.com)  
125 Broad Street  
New York, New York 10004  
(212) 558-4000

*Attorneys for Standard Chartered Financial Services (Luxembourg) S.A., Standard Chartered Bank International (Americas) Ltd. and Standard Chartered International (USA) Ltd.*